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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DONALD H. PUTNAM, an individual,

Plaintiff,

v.

PUTNAM LOVELL GROUP NBF
SECURITIES, INC., a Delaware
corporation, and NATIONAL BANK OF
CANADA, a Canadian chartered bank,
NATIONAL BANK FINANCIAL, INC., a
Quebec corporation; and DOES 1-20,
inclusive,

Defendants.

CASE NO. C 05 1330 CW (EMC)

**STIPULATION AND [PROPOSED]
ORDER ENLARGING BRIEFING
SCHEDULE ON PLAINTIFF'S MOTION
TO COMPEL**

DATE: JULY 19, 2006
TIME: 3:00 P.M.
COURTROOM C, 15th FLOOR
THE HONORABLE EDWARD M. CHEN

WHEREAS, plaintiff filed and served a motion to compel defendants to produce documents and answer interrogatories;

WHEREAS, the Court scheduled a hearing on plaintiff's motion for July 19, 2006;

WHEREAS, the parties have continued to meet and confer in an effort to resolve the issues raised by plaintiff's motion;

WHEREAS, the parties have agreed to enlarge defendants' time to file their opposition to plaintiff's motion by two days and to enlarge plaintiff's time to file his reply brief by two days;

WHEREAS, taking into account that plaintiff's time to prepare his reply brief substantially overlaps with the July 4 holiday weekend,

IT IS HEREBY STIPULATED AND AGREED, as follows:

1. Defendants' time to file their brief in opposition to plaintiff's motion to compel is enlarged by two (2) days to and including June 30, 2006; by 12:00 p.m.

2. Plaintiff's time to file his reply brief in further support of plaintiff's motion to compel is enlarged by two (2) days to and including July 7, 2006; by 12:00 p.m.

3. The hearing shall remain scheduled on July 19, 2006 at 3:00 p.m.

Dated: June 28, 2006

TORYS LLP

By: /s/ Lauren Reiter Brody
Lauren Reiter Brody

Attorneys for Defendants

Dated: June 28, 2006

KEKER & VAN NEST, LLP

By: /s/ Christopher C. Kearney
Christopher C. Kearney

Attorneys for Plaintiff

So Ordered: (as modified on Lines 10 & 12)

Edward M. Chen
United States Magistrate

